

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

)	
In the Matter of an Arbitration Between:)	
PT SUMOHADIWIDJOJO,)	
)	
Applicant and)	CIVIL ACTION NO. 04 12646 NG
Counterclaim Defendant)	
(Respondent below))	RESPONDENT’S MOTION TO
)	STAY CONFIRMATION AND
and)	ENFORCEMENT OF THE SIAC AWARD
)	
BSB RESIDUAL ASSETS TRUST,)	ORAL ARGUMENT REQUESTED
BSB TRUST COMPANY, LTD., Trustee,)	
)	
Respondent and)	
Counterclaim Plaintiff)	
(Claimant below).)	
)	
)	
CITIZENS BANK)	
)	
Trustee)	
)	
)	

Respondent and Counterclaim Plaintiff BSB Residual Assets Trust and BSB Trust Company, Ltd., Trustee, (collectively “BSB”) hereby moves to stay confirmation and enforcement of the arbitration award of the Singapore International Arbitration Centre dated December 15, 2004, in the arbitration between BSB Residual Assets Trust and Applicant PT Sumohadiwidjojo (“PTSW”), pending complete adjudication of BSB’s rights and PTSW’s obligations under the Loan Agreement between BSB and PTSW. The reasons for so moving are set forth in the Memorandum filed herewith. A proposed order is attached to this motion.

Counsel for BSB has conferred with counsel for PTSW with regard to the substance of this motion pursuant to Local Rule 7.1(A)(2).

REQUEST FOR ORAL ARGUMENT

BSB believes that oral argument could assist the Court and wishes to be heard.

BSB RESIDUAL ASSETS TRUST
AND BSB TRUST COMPANY, LTD.,
TRUSTEE, Respondent and Counterclaim Plaintiff

By its attorneys,

/s/ Mark C. Fleming

Richard A. Johnston (BBO # 253420)

Mark C. Fleming (BBO # 639358)

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Dated: April 28, 2005

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FOR THE DISTRICT OF MASSACHUSETTS

In the Matter of an Arbitration Between:)

PT SUMOHADIWIDJOJO,)

Applicant and)
Counterclaim Defendant)
(Respondent below))

CIVIL ACTION NO. 04 12646 NG

and)

BSB RESIDUAL ASSETS TRUST,)
BSB TRUST COMPANY, LTD., Trustee,)

Respondent and)
Counterclaim Plaintiff)
(Claimant below).)

CITIZENS BANK)

Trustee)
_____)

**[PROPOSED] ORDER ON RESPONDENT'S MOTION TO STAY CONFIRMATION
AND ENFORCEMENT OF THE SIAC AWARD**

The confirmation and enforcement of the Final Award dated December 15, 2004, issued by the Singapore International Arbitration Center in the arbitration between Respondent BSB Residual Assets Trust and Applicant PT Sumohadiwidjojo, is hereby STAYED pending further order of the Court.

Dated: _____, 2005

Judge